

FILED

JUN 20 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

SHAWNE N. MACK,

Defendant.

INFORMATION

CASE NO.

7:24 CR 00225

Title 18, United States Code,
Section 1029(a)(2)

JUDGE ADAMS

GENERAL ALLEGATIONS

At all times relevant to this Information, unless otherwise specified:

Defendant, Company-1, and Victim-1

1. Defendant SHAWNE N. MACK resided in or around Fairlawn, Ohio, in the Northern District of Ohio, Eastern Division.
2. Company-1 provided medical supplies and services to customers and was located in the Northern District of Ohio. Victim-1 owned Company-1.
3. Defendant was an employee of Company-1 and held the position of Office Manager. Defendant was employed by Company-1 from in or around September 2016 through on or about November 5, 2019, when she was terminated.
4. As Office Manager, Defendant was responsible for maintaining the financial accounts for Company-1 and had access to its corporate checks and credit cards. Defendant's duties included payroll, maintaining accounting software, processing invoices, and purchasing company equipment, among others.

The Embezzlement Scheme

5. From on or about October 2, 2016, through on or about November 5, 2019, Defendant embezzled and stole money and funds belonging to Company-1 and Victim-1 by issuing checks and making unauthorized purchases on unauthorized access devices, including credit and debit card accounts in the names of Company-1 and Victim-1. Defendant, without the knowledge or consent of Company-1 or Victim-1, and with the intent to defraud:

- a. cashed or deposited \$97,688.52 in unauthorized checks drawn on Company-1's bank account that Defendant issued to herself, forging Victim-1's signature on the checks;
- b. made \$178,190.90 in personal purchases using Company-1's credit and debit cards, and incurred an additional \$12,794.81 in interest and late fees;
- c. initiated \$6,381.52 in payments from Company-1's bank account to Defendant's own credit card account; and
- d. opened credit card accounts with retailers in the name of Victim-1, while using Defendant's home address and email addresses for the accounts to conceal the accounts from Company-1 and Victim-1, and made unauthorized personal purchases on those credit card accounts.

6. As defined in Title 18, United States Code, Section 1029(e):

- a. "Access device" includes any card, plate, code, account number, electronic serial number, personal identification number or other means of account access that can be used alone or in conjunction with another access device to obtain money, goods, services, or any other thing of value, or that can be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument).

b. “Unauthorized access device” means any access device that is lost, stolen, expired, revoked, cancelled or obtained with the intent to defraud.

COUNT 1
(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The United States Attorney charges:

7. The allegations contained in paragraphs 1 through 6 of this Information are re-alleged and incorporated by reference as if stated fully herein.

8. From in or around October 2016 through in or around September 2017, in the Northern District of Ohio, Eastern Division, Defendant SHAWNE N. MACK, knowingly and with intent to defraud, used unauthorized access devices during a one-year period, to wit: credit and debit card account numbers obtained with intent to defraud, and by such conduct, obtained approximately \$53,340.33 during that one-year period, said use affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(2).

COUNT 2
(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The United States Attorney further charges:

9. The allegations contained in paragraphs 1 through 6 of this Information are re-alleged and incorporated by reference as if stated fully herein.

10. From in or around October 2017 through in or around September 2018, in the Northern District of Ohio, Eastern Division, Defendant SHAWNE N. MACK, knowingly and with intent to defraud, used unauthorized access devices during a one-year period, to wit: credit and debit card account numbers obtained with intent to defraud, and by such conduct, obtained approximately \$76,505.33 during that one-year period, said use affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(2).

COUNT 3

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))

The United States Attorney further charges:

11. The allegations contained in paragraphs 1 through 6 of this Information are re-alleged and incorporated by reference as if stated fully herein.

12. From in or around October 2018 through in or around September 2019, in the Northern District of Ohio, Eastern Division, Defendant SHAWNE N. MACK, knowingly and with intent to defraud, used unauthorized access devices during a one-year period, to wit: credit card account numbers obtained with intent to defraud, and by such conduct, obtained approximately \$45,592.59 during that one-year period, said use affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(2).

COUNT 4

(Access Device Fraud, 18 U.S.C. § 1029(a)(2))


The United States Attorney further charges:

13. The allegations contained in paragraphs 1 through 6 of this Information are re-alleged and incorporated by reference as if stated fully herein.

14. From in or around October 2019 through in or around November 2019, in the Northern District of Ohio, Eastern Division, Defendant SHAWNE N. MACK, knowingly and with intent to defraud, used unauthorized access devices during a one-year period, to wit: credit card account numbers obtained with intent to defraud, and by such conduct, obtained

approximately \$2,752.65 during that one-year period, said use affecting interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(2).

REBECCA C. LUTZKO
United States Attorney

By: 

Elliot Morrison, Chief
White Collar Crimes Unit